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7 Attorneys for Plaintiffs

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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 BIRDDOG TECHNOLOGY
LIMITED, an Australian company;
12 and BIRDDOG AUSTRALIA PTY,
LTD, an Australian company,

13 Plaintiffs,

14 v.

15 2082 TECHNOLOGY, LLC DBA
16 BOLIN TECHNOLOGY, a California
limited liability company; BOLIN
17 TECHNOLOGY CO., LTD., a Chinese
limited company; HOI "KYLE" LO, an
18 individual; JENNIFER LEE, an
individual; and DOES 3 through 25,
19 inclusive,

20 Defendants.

Case No. 2:23-cv-09416 CAS (AGRx)

**DECLARATION OF GABRIEL M.
HUEY ISO PLAINTIFFS BIRDDOG
TECHNOLOGY LIMITED'S AND
BIRDDOG AUSTRALIA PTY LTD'S
REQUEST FOR ENTRY OF
DEFAULT PURSUANT TO FRCP
55(a)**

*[Filed concurrently with Plaintiffs'
Request for Entry of Default]*

1 I, Gabriel M. Huey, declare:

2 1. I am a partner at the law firm of K&L Gates LLP, counsel for Plaintiffs
3 BirdDog Technology Limited (“BirdDog Technology”) and BirdDog Australia
4 Pty, Ltd. (“BirdDog Australia”) (collectively, “BirdDog” or “Plaintiffs”).
5 Unless otherwise noted, I have personal knowledge of the following facts and, if
6 called as a witness, I could and would testify competently thereto.

7 2. Plaintiffs filed their complaint against defendants 2082 Technology, LLC
8 dba Bolin Technology, Mr. Hoi “Kyle” Lo and DOES 1-25 on November 7, 2023.
9 (Dkt. 1.) Bolin Technology Co., Ltd. (“Bolin Limited”) was substituted as the
10 defendant previously sued under the fictitious name of Doe 1 on January 12, 2024.
11 (Dkt. 34.)

12 3. Bolin Limited was personally served with the Summons and First
13 Amended Complaint (“FAC”) on February 12, 2024, pursuant to Fed. R. Civ. P.
14 4(h)(1)(B), and Plaintiffs filed the Proof of Service as Dkt. 58.

15 4. Pursuant to Fed. R. Civ. Proc. 12, Bolin Limited was required to respond,
16 answer or otherwise plead to Plaintiffs’ FAC by March 4, 2024.

17 5. As of March 5, 2024, neither Bolin Limited nor anyone claiming to
18 represent Bolin Limited has responded to the FAC or contacted Plaintiffs or their
19 counsel to request an extension of time to respond to Plaintiffs’ FAC.

20 6. Bolin Limited is not a minor or incompetent person or in military service or
21 otherwise exempted under the Soldiers’ and Sailors’ Civil Relief Act of 1940.

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct.

24 Executed on March 5, 2024, at Los Angeles, California.

25 /s/ Gabriel M. Huey

26 Gabriel M. Huey